

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	Case No. 22-33553
	§	
ALEXANDER E. JONES	§	Chapter 11
	§	
Debtor.	§	

**VERIFIED RULE 2019 STATEMENT OF MULTIPLE REPRESENTATION**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the undersigned counsel submits this verified statement (the “**Verified Statement**”) and in support thereof respectfully states as follows:

1. Cain & Skarnulis PLLC (“**C&S**”) and Koskoff Koskoff & Bieder PC (“**Koskoff**” and together with C&S, the “**Connecticut Plaintiffs’ Counsel**”)<sup>1</sup> represent the following parties in the above-captioned matter (collectively, the “**Connecticut Plaintiffs**”<sup>2</sup>):

- a. David Wheeler;
- b. Francine Wheeler;
- c. Jacqueline Barden;
- d. Mark Barden;
- e. Nicole Hockley;
- f. Ian Hockley;
- g. Jennifer Hensel;
- h. Donna Soto;
- i. Carlee Soto Parisi;
- j. Carlos M. Soto;
- k. Jillian Soto-Marino;
- l. William Aldenberg;
- m. William Sherlach; and
- n. Robert Parker.

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<sup>1</sup> Akin, Gump, Strauss, Hauer, & Feld, LLP has provided advice to both the Connecticut Plaintiffs and the Texas Plaintiffs in connection with this chapter 11 case on a strictly pro bono basis and will continue to do so.

<sup>2</sup> The Connecticut Plaintiffs and their counsel have worked closely with the Texas Plaintiffs and their counsel and will continue to do so.

2. In accordance with Bankruptcy Rule 2019, the address for each of the Connecticut Plaintiffs is shown on **Exhibit A** attached hereto.

3. The Connecticut Plaintiffs are each a creditor, and the nature and principal amount of each of their claims is described on **Exhibit A** attached hereto. In accordance with Bankruptcy Rule 2019, **Exhibit A** provides all disclosable economic interests held by each Connecticut Plaintiff in relation to Alexander E. Jones (the “**Debtor**”).<sup>3</sup>

4. Jones is a defendant in three consolidated lawsuits brought by the Connecticut Plaintiffs.<sup>4</sup>

5. The Connecticut Plaintiffs are monitoring the Debtor’s case. C&S and Koskoff hold no interest in the Debtor or his estate. None of the Connecticut Plaintiffs’ disclosable economic interests have been assigned subsequent to the commencement of the Debtor’s case and have not been solicited for purchase by C&S nor Koskoff.

6. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver of any Connecticut Plaintiff’s rights to assert, file, and/or amend its claim(s) in accordance with applicable law and any orders entered in this case establishing procedures for filing proofs of claim.

7. Connecticut Plaintiffs’ Counsel reserve the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

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<sup>3</sup> An additional Connecticut plaintiff, Richard Coan, Trustee of the Bankruptcy Estate of Erica Lafferty is a creditor. Ms. Lafferty has also filed a proof of claim. Mr. Coan and Ms. Lafferty have not appeared in this proceeding, except to file proofs of claim.

<sup>4</sup> These three consolidated lawsuits are on the Complex Litigation Docket of Waterbury, Connecticut and are named as follows: *Lafferty, et al. v. Jones, et al.*, No. X06-UWY-CV18-6046436-S, *Sherlach v. Jones, et al.*, No. X06-UWY-CV18-6046437-S and *Sherlach, et al. v. Jones, et al.*, No. X06-UWY-CV18-6046438-S.

Respectfully submitted this 9<sup>th</sup> day of December 2022.

/s/ Ryan E. Chapple

Ryan E. Chapple

State Bar No. 24036354

Email: rchapple@cstrial.com

**CAIN & SKARNULIS PLLC**

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Austin, Texas 78701

512-477-5000

512-477-5011—Facsimile

**ATTORNEY FOR THE CONNECTICUT  
PLAINTIFFS**

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Verified Statement has been served on counsel for Debtor, Debtor, the U.S. Trustee, as well as all parties receiving or entitled to notice through CM/ECF and in accordance with the Rules on this 9<sup>th</sup> day of December 2022.

/s/ Ryan E. Chapple

Ryan E. Chapple

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IN RE: § Case No. 22-33553  
ALEXANDER E. JONES §  
§  
§  
§  
§ Debtor. § Chapter 11

## VERIFICATION

THE STATE OF CONNECTICUT §  
§  
COUNTY OF FAIRFIELD §

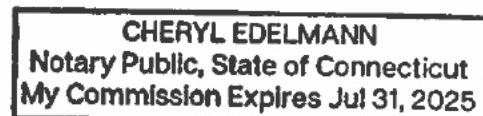
BEFORE ME, personally appeared Alinor Sterling, who after being duly sworn, did state:

"I am one of the attorneys of record for David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker. I have read the Verified Rule 2019 Statement of Multiple Representation and know the contents to be true and correct to the best of my knowledge and belief."

**Alinor Sterling, Affiant**

SWORN TO and subscribed before me this 9<sup>th</sup> day of December 2022.

**Notary Public, State of Connecticut**  
**Commission Expires: 7/31/25**



**EXHIBIT A**

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim <sup>5</sup>
David Wheeler c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$55,000,000.00 in compensatory damages and \$28,429,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Francine Wheeler c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$54,000,000.00 in compensatory damages and \$28,099,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Jacqueline Barden c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$28,800,000.00 in compensatory damages and \$19,699,303.73 in punitive damages;

<sup>5</sup> This statement is not intended as consent pursuant to 28 U.S.C. § 157(c)(2) or waiver of the right to liquidation or estimation of unliquidated claims for purposes of distribution outside of the bankruptcy proceeding pursuant to 28 U.S.C. § 157(b)(2)(B) or waiver of the right to trial by jury pursuant to 28 U.S.C. § 1411.

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	violation of the Connecticut Unfair Trade Practices Act	post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Mark Barden c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$57,600,000.00 in compensatory damages and \$29,299,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Nicole Hockley c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$73,600,000.00 in compensatory damages and \$34,629,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim <sup>5</sup>
Ian Hockley c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$81,600,000.00 in compensatory damages and \$37,299,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Jennifer Hensel c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$52,000,000.00 in compensatory damages and \$27,429,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Donna Soto c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$48,000,000.00 in compensatory damages and \$26,099,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v.</i>

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim <sup>5</sup>
		<i>Jones, et al., No. X06-UWY-CV18-6046438-S.</i> There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Carlee Soto Parisi c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$66,000,000.00 in compensatory damages and \$32,099,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Carlos M. Soto c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$57,600,000.00 in compensatory damages and \$29,299,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
Jillian Soto-Marino c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$68,800,000.00 in compensatory damages and \$33,029,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex

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		Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
William Aldenberg c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$90,000,000.00 in compensatory damages and \$40,099,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.
William Sherlach c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation per se; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$36,000,000.00 in compensatory damages and \$22,099,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.

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Robert Parker c/o Koskoff Koskoff & Bieder PC 350 Fairfield Avenue Bridgeport, Connecticut 06604	Plaintiff in a case alleging invasion of privacy by false light; defamation and defamation <i>per se</i> ; intentional infliction of emotional distress; and violation of the Connecticut Unfair Trade Practices Act	Verdict for plaintiff and against Jones and Free Speech Systems, LLC in the amount of \$120,000,000.00 in compensatory damages and \$50,099,303.73 in punitive damages; post-verdict motions filed by Jones and Free Speech Systems, LLC pending; these claims are asserted in three consolidated cases on the Complex Litigation Docket of Waterbury, Connecticut: <i>Lafferty, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046436-S, <i>Sherlach v. Jones, et al.</i> , No. X06-UWY-CV18-6046437-S and <i>Sherlach, et al. v. Jones, et al.</i> , No. X06-UWY-CV18-6046438-S. There are also TUFTA claims pending against Alex Jones in Adv. No. 22-03331, now pending in this Court.